MRF 9902

## EGEG ROCKY FLATS

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February 20, 1991

91-RF-0902

Robert M Nelson, Jr Manager DOE, RFO

Attn F. R. Lockhart, S R Grace

IAG MILESTONE PLAN FOR PREVENTION OF CONTAMINANT DISPERSION, REQUEST FOR SCHEDULE EXTENSION

As proposed by DOE in the February 7, 1991 IAG Project Coordinator's meeting and discussed in your February 8, 1991 letter to Messrs. Hestmark and Baughman, we are submitting the attached Interim PPCD for transmittal to EPA/CDH on February 21, 1991. Comments from DOE-RFO-ER staff have been incorporated. The Interim PPCD references existing procedures and project-specific Health and Safety Plan actions to prevent contaminant dispersion. The Interim PPCD will be used to cover field activities until the Final PPCD is approved.

In addition, EG&G requests an extension for submitting the Final Plan for Prevention of Contaminant Dispersion (PPCD) The PPCD is a required deliverable under the terms of the Interagency Agreement (IAG) EG&G is requesting an extension from the scheduled date of February 21, 1991 to July 22, 1991. This issue has been under discussion with DOE-RFO-ER, EPA and CDH for several weeks. This extension will also delay delivery of the PPCD Responsiveness Summary from June 26, 1991 to November 18, 1991. This extension is necessary to accommodate the two following issues:

- (1) A one month delay resulting from revised RFP procurement procedures
- (2) Major rework of the document and an expansion of scope as required by CDH and EPA review comments. This work will require an additional three to four months to complete.

Substantiation of these two issues is as follows

Review comments from CDH and EPA were received on December 19, 1990. Work on responding to the comments, however, could not begin until January 18, 1991, when DOE's approval of the Basic Ordering Agreement (BOA) contract was received by EG&G Consequently, an approximate one month production delay was incurred.

BURLINGAME, A H CROUCHER, DW DAVIS J G EVERED JE FERRERA DW FERRERA, K P FERRIS, L. R FRAIKOR, FJ FRANCIS. G.E GOODWIN R HEALY, T.J. IDEKER, E.H. JENS, J P KERSH, J M KIRBY, WA KIRKEBO, J.A LEE, E M MAJESTIC. J.R. McDANIEL, M.G. MEURRENS, B.E MONTROSS, RW MORGAN, RV NORTH, P PALMER, L.A PARNELL, R.F. POTTER GI PIZZLITO, V.M. RHOADES, J.I. <u>Saffell. B.F</u> SHANNON, W.M. SWANSON, E R WIEBE, J.S. WILKINSON, R.B. E.R ZANE, JO APAID NTHNOTHN G PORTER CORRES CONTROL X TRAFFIC

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By F J Curran U - NVV

Date 7-29-91

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ADMIN RECORD

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CDH and EPA comments were extensive (25 pages) and indicated that, while the Draft PPCD was not unresponsive to the IAG Statement Of Work (SOW), it did not meet the reviewers expectations. In follow-up discussions, CDH and EPA acknowledged that the IAG SOW was vague and did not adequately convey their requirements for the PPCD.

Meetings were held with CDH and EPA on January 31, 1991 and February 7, 1991 to resolve the misunderstandings and to develop a plan to finalize the PPCD. At the February 7, 1991, meeting DOE/EG&G proposed a technical approach in response to CDH's and EPA's comments and concerns. The proposed technical approach involves substantial additional work as well as integration of information currently in the Draft PPCD. CDH and EPA agreed that the proposed technical approach was appropriate.

Based on performing the proposed technical approach, a revised PPCD can be submitted to CDH and EPA as a final document no earlier than July 22, 1991. To revise the PPCD in accordance with the proposed technical approach, a contract modification will have to be submitted and approved without a delay in production.

We apologize for the lateness of this request for extension. Until the meeting with CDH and EPA on February 7, 1991, we were unable to define the scope of work required to adequately respond to their comments and concerns. Please contact Dennis Smith at extension 5958, if you have any additional questions concerning this request or if you wish us to deliver the document to EPA and CDH.

J. M. Kersh, Associate General Manager Environmental Restoration & Waste Management EG&G Rocky Flats, Inc.

DMS.csk

Orig. and 1 cc - R. M. Nelson, Jr.

Attachment: As Stated